

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MARK TRIGGS, <i>et al.</i>)	CASE NO. 1:13cv-1897
)	
Plaintiffs,)	JUDGE: Patricia A. Gaughan
)	
vs.)	
)	
LOWE’S COMPANIES, INC., <i>et al.</i>)	<u>MOTION OF DEFENDANTS FOR</u>
)	<u>ADMISSION OF LINDSAY B.</u>
)	<u>VELARDE, ESQ. PRO HAC VICE</u>
Defendants.)	

Pursuant to Local Rule 83.5(h), Defendants Lowe’s Home Centers, Inc. and Lowe’s Companies, Inc. (“Defendants”), by and through counsel, hereby move for the admission of Lindsay B. Velarde, Esq., *pro hac vice* as follows:

Ms. Velarde is an attorney in the law firm of Hunton & Williams LLP. Her primary office location is 2200 Pennsylvania Avenue, N.W., Washington, D.C. 20037. Her telephone number is (202) 955-1860, her fax number is (202) 862-3844, and her email address is lvelarde@hunton.com.

Ms. Velarde is a member in good standing of the Virginia State Bar (Bar No. 79166) and the District of Columbia Bar (Bar No. 978925). Ms. Velarde is also a member in good standing of the United States District Court for the Eastern District of Virginia.

Ms. Velarde has not been disbarred or suspended from practice before any court, department, bureau or commission of any state or the United States, nor has Ms. Velarde ever received a reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of the bar.

Ms. Velarde is familiar with and will abide by the Local Rules of the United States District Court for the Northern District of Ohio.

Ms. Velarde will appear in this action as additional counsel for Lowe's Companies, Inc. and Lowe's Home Centers, Inc. An affidavit of Lindsay B. Velarde in support of this motion is attached as Exhibit A.

Wherefore, Defendants respectfully request the court to enter an order permitting Lindsay B. Velarde to be admitted *pro hac vice* for purposes of participating in all court proceedings in this matter.

Respectfully submitted,

/s/ Douglas B. Schnee

Douglas B. Schnee (0063643)

McDonald Hopkins LLC

600 Superior Avenue East

Suite 2100

Cleveland, OH 44114

Telephone: (216) 348-5720

Facsimile: (216) 348- 5474

E-Mail: dschnee@mcdonaldhopkins.com

***Attorney for Defendants Lowe's Companies,
Inc. and Lowe's Home Centers, Inc.***

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 2013, the foregoing *MOTION OF DEFENDANTS FOR ADMISSION OF LINDSAY B. VELARDE PRO HAC VICE* was filed electronically. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system to:

DANIEL P. PETROV
MARK GRIFFIN
J. MATTHEW LINEHAN
Thorman Petrov Griffin Co., LPA
3100 Terminal Tower
50 Public Square
Cleveland, Ohio 44113

Counsel for Plaintiffs

/s/Douglas B. Schnee
Douglas B. Schnee
***Attorney for Defendants Lowe's Companies,
Inc. and Lowe's Home Centers, Inc.***